From:

"Miriam Lopez Gonzalez" <mlgonzalez@antillesfreight.com>

To:

<Secretary@FMC.gov>

Date:

9/24/04 4:16PM

Subject:

NCBFAA's Petition for Tariff Exemption

Dear Sirs:

Attached please find our letter in support of the NCBFAA's petition for tariff exemption.

Regards, Miriam Lopez-Gonzalez Antilles Freight Corporation 11206 N. W. 36th Avenue Miami, Florida 33167

CC:

<bpre><bpre><bpre><bpre><bpre>com>, <jrhoden@antillesfreight.com>, <elopez@antillesfreight.com>

September 23, 2004

Honorable Bryant L. VanBrakle, Secretary Federal Maritime Commission 800 North Capitol Street, N. W. Washington, D. C. 20573-0001

Re: Petition of The National Customs Brokers and Forwarders Association of America, Inc. For Tariff Exemption

Dear Secretary VanBrakle:

Antilles Freight Corporation is a NVOCC/FF formed in 1988. We have 19 employees and service over 5,000 clients in the shipping community. We issue approximately 9,850 bills of lading per year.

We are aware of the UPS/NITL petition and of the tariff exemption petition originally filed by the NCBFAA. It is our position that the proposal by UPS/NITL does nothing to eliminate the cost and burden we currently experience in filing our rates in compliance with the current regulations. We see no reason to file such agreements with the FMC or publish essential terms since this burdensome filing serves no purpose to the shipping community. Today, none of our clients access our electronically available tariff nor is there any reason to believe this will change in the future. Our rates are continually changing as many times rates are negotiated on a "spot" basis thus the memorializing of the rates is burdensome, impractical and not useful. Our rates with our clients can be memorialized in written form between the client and the NVO but we would not like to have to file this information with the FMC.

The NCBFAA petition seeking the broad tariff exemption is far more preferable as it eliminates needless expense, permits NVOCC's to be more responsive to the ocean shipping marketplace and the needs of our clients and still permits the FMC to oversee the trade and correct any abuses or malpractices.

We urge the FMC to take prompt action to grant the NCBFAA's petition as soon as possible.

HT CORPORATION

ELL:mlg